

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

VALDIN O'DONNELL,
a/k/a "Valdin Kadric,"

Defendant.

INFORMATION

19 Cr. (LGS)

19 CRIM 935

COUNT ONE

The United States Attorney charges:

1. In or about 2016, in the Southern District of New York and elsewhere, VALDIN O'DONNELL, a/k/a Valdin Kadric, the defendant, knowingly transported, transmitted, and transferred, and caused to be transported, transmitted, and transferred, in interstate and foreign commerce, goods of the value of \$5,000 and more, knowing the same to have been stolen, converted, and taken by fraud, to wit, O'DONNELL transported a lithograph stolen from the home of its rightful owner, valued over \$5,000, from the State of New Jersey to the State of New York, knowing the lithograph to be stolen.

(Title 18, United States Code, Sections 2314 and 2.)

FORFEITURE ALLEGATIONS

2. As a result of committing the offense alleged in Count One of this Information, VALDIN O'DONNELL, a/k/a "Valdin

Kadric," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

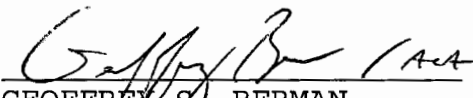
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. §§ 2314, 2)

GEOFFREY S. BERMAN
United States Attorney
